

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

DOUGLAS I. HORNSBY, Administrator of  
the Estate of CYNTHIA GARY,

Plaintiff,

vs.

UNITED STATES of AMERICA,

METRO MACHINE CORP., d/b/a  
GENERAL DYNAMICS NASSCO-  
NORFOLK,

HARBOR INDUSTRIAL SERVICES, INC.,

COASTAL MECHANICAL SYSTEMS,  
LLC,

ADVANCED INTEGRATED  
TECHNOLOGIES, LLC,

KD SHIPYARD REPAIRS, LLC,

And

CECO ENVIRONMENTAL CORP.,

Defendants.

**CIVIL ACTION NO. 2:22-CV-427**

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S AMENDED  
COMPLAINT**

**NOW COMES** Defendant, Coastal Mechanical Systems, LLC, (“Defendant Coastal”) by and through undersigned counsel, and moves this Court pursuant to Rule 6(b) of the Federal Rules of Civil Procedure to extend the deadline to answer, object, or otherwise respond to Plaintiff’s

Amended Complaint up to **May 4, 2023**. In support of this motion, Defendant shows unto the Court the following:

1. Plaintiff filed its Amended Complaint herein on March 10, 2023 [DE # 21].
2. Defendant was purportedly served with the Summons and Amended Complaint on March 23, 2023.
3. Undersigned was engaged to represent Defendant Coastal in this matter on April 5, 2023.
4. Undersigned requires additional time to meaningfully confer with Defendant Coastal in order to answer, object, or otherwise respond to Plaintiff's Amended Complaint.
5. Undersigned has conferred with counsel for Plaintiff, Andrew M. Hendrick and Robert John Haddad on April 6, 2023, who have no objection to the relief sought in this Motion.
6. Undersigned has conferred with counsel for the United States, Malinda Robbin Lawrence, Garry D. Hartlieb and Darren Earl Myers on April 10, 2023, who also have no objection to the relief sought in this Motion.
7. This matter concerns a fatality that occurred on a United States Vessel that was in the course of repair and rehabilitation work by a general contractor and multiple subcontractors.
8. To Defendant Coastal's knowledge, there were multiple subcontractors onboard the Vessel at the time of the fatal incident, of which some, or all, have been joined via this Amended Complaint.
9. Defendant Coastal continues to investigate its records and information within its control to share with undersigned in order to assist in preparing a meaningful response to the Amended Complaint.

10. The Plaintiff and Defendant United State have agreed to provide undersigned with certain facts and records that are expected to aid Defendant Coastal and undersigned in responding meaningfully to the Amended Complaint.

11. To Defendant Coastal's knowledge the only parties to appear in this action are Plaintiff and Defendant United States of America and, on consultation with them, they have no objection to the relief requested herein.

12. The Parties will not be prejudiced in affording Defendant Coastal this extension of time to respond to the Amended Complaint.

This the 12th day of April, 2023.

**CRANFILL SUMNER LLP**

By: /s/ Jason R. Harris  
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*Attorney for Defendant Coastal  
Mechanical Systems, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document MOTION FOR EXTENSION OF TIME with the Clerk of the Court using CM/ECF system which will send notification of such filing to the following:

Robert John Haddad  
Andrew Mitchell Hendrick  
Ruloff Swain Haddad Morecock  
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Garry D. Hartlieb  
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Civil Division  
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*Attorneys for Defendant United  
States of America*

This the 12th day of April, 2023.

CRANFILL SUMNER LLP

By: /s/ Jason R. Harris  
Jason R. Harris